



Center for the  
Polyurethanes Industry

Submitted Electronically

May 12, 2016

Hampton Newsome, Attorney  
Division of Enforcement  
Bureau of Consumer Protection  
Federal Trade Commission  
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Washington, DC 20580  
[hnewsome@ftc.gov](mailto:hnewsome@ftc.gov)  
<https://ftcpublic.commentworks.com/ftc/rvaluerule/>

**Re: 16 CFR part 460 – R-Value Rule Review, Matter No. R811001  
Request for 90-day Extension of Public Comment Period**

Dear Mr. Newsome:

The American Chemistry Council's Center for the Polyurethanes Industry<sup>1</sup> (CPI) and Spray Foam Coalition<sup>2</sup> (SFC) write to request a 90-day extension of the public comment period for the Federal Trade Commission's (FTC) Advanced Notice of Proposed Rulemaking (ANPR) on the Trade Regulation Rule Concerning the Labeling and Advertising of Home Insulation (the "R-value Rule").

CPI and SFC members manufacture various types of home insulation products, including spray polyurethane foam (SPF) and rigid polyurethane foam board insulation. Our membership also includes suppliers of raw materials and equipment used in the manufacture of polyurethane

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<sup>1</sup> The Center for the Polyurethanes Industry (CPI) of the American Chemistry Council serves as the voice of the polyurethanes industry in North America, promoting its development and coordinating with polyurethane trade associations across the globe. The polyurethane industry supports research and initiatives that serve its communities and customers. The business of polyurethane is a \$26.5 billion enterprise and a key element of the U.S. economy. The industry operates in more than 1,000 locations in the U.S. and directly employs more than 46,500. A major job creator in the U.S., each job in the polyurethanes industry yields five more jobs indirectly for an approximate total of 235,000 jobs supported.

<sup>2</sup> The Spray Foam Coalition (SFC) champions the use of spray polyurethane foam in U.S. building and construction applications and promotes its economic, environmental and societal benefits while supporting the safe manufacture, transport, and application of spray polyurethane foam. SFC consists of manufacturers of spray polyurethane foam systems as well as suppliers of raw materials and machinery used to apply the foam.

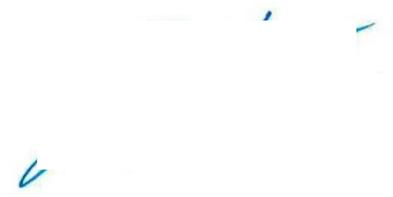


insulation products. As stakeholders in the home insulation industry, our organizations and members have a vested interest in reviewing and providing comment to FTC regarding the R-value Rule.

As noted in the ANPR, the FTC last conducted a review of the R-value Rule in 2005. Over the intervening decade, the insulation industry and certain insulation products have changed substantially. For example, new industry research is available on the short-term and long-term thermal performance of SPF products.<sup>3</sup> Additional research has also been developed to explore the energy efficiency benefits of insulation products that combine air sealing with high thermal resistance properties. It will take considerable time for companies and industry trade organizations to present this new information in a useful manner to Commission personnel. CPI and SFC, therefore, request that FTC provide a 90-day extension to the public comment period for the R-value Rule.

We appreciate your attention to our request for a 90-day extension of the public comment period. We respectfully ask that your office respond within ten (10) business days from the date of this letter so that we may plan accordingly. If you have any questions, please contact me at [justin\\_koscher@americanchemistry.com](mailto:justin_koscher@americanchemistry.com), (202) 249-6617.

Kind regards,



Justin Koscher  
Center for the Polyurethanes Industry  
Spray Foam Coalition

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<sup>3</sup> This new research is directly responsive to FTC's request for information on whether the Commission should amend to the R-value Rule to require ASTM 1303 testing for all closed-cell foam insulation products.